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August 22, 2024

VIA EMAIL ONLY

The Honorable Jeffrey L. Schmehl, U.S.D.J.
U.S. District Court for the Eastern District of Pennsylvania
The Gateway Building, Suite 518
201 Penn Street
Reading, PA 19601

***Re: Manco v. St. Joseph's University et al.,
Docket No. 5:22-CV-00285
Discovery Dispute***

Dear Judge Schmehl:

Please recall that this firm represents Plaintiff Gregory Manco in the above matter. Pursuant to your Policies and Procedures, Plaintiff would like to make you aware of a discovery dispute with Defendant St. Joseph's University ("SJU").

On July 25, 2024, Plaintiff's counsel sent SJU's counsel a Discovery Deficiency Letter seeking the following: (1) a privilege log for their responsive documents to Plaintiff's First Set of the Production of Documents; (2) to re-review the redactions made in their production due to certain redactions being left unredacted in other Defendants productions; and (3) any applicable insurance documents as requested in Request 24 of Plaintiff's First Set of the Production of Documents. To date, Plaintiff has not received any of the requested information.

Plaintiff kindly requests that a telephone conference be scheduled to discuss these issues. In the alternative, Plaintiff asks that these issues be addressed during the September 5, 2024 Status Conference.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a series of connected loops and a final horizontal stroke.

John P. McAvoy, Esq.

cc: all counsel